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11 *Attorneys for Plaintiff, U.S. Bank National Association, as Trustee for the GSAMP Trust 2006-*
12 *HE2 Mortgage Pass-Through Certificates, Series 2006-HE2*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 U.S. BANK NATIONAL ASSOCIATION, AS
16 TRUSTEE FOR THE GSAMP TRUST 2006-
17 HE2 MORTGAGE PASS-THROUGH
18 CERTIFICATES, SERIES 2006-HE2,,
19

20 Plaintiff,

21 vs.

22 CHICAGO TITLE INSURANCE COMPANY,
23 Defendants.
24

Case No.: 2:19-cv-01728-GMN-VCF

**STIPULATION TO 1) AMEND
COMPLAINT AND 2) SET RESPONSE
DEADLINES**

25 Plaintiff, U.S. Bank National Association, as Trustee for the GSAMP Trust 2006-HE2
26 Mortgage Pass-Through Certificates, Series 2006-HE2 (“U.S. Bank”) and Defendant Chicago
27 Title Insurance Company (“Chicago Title”, collectively, the “Parties”), by and through their
28 undersigned counsel, stipulate and agree as follows, subject to the approval of the District Court:

1. On October 4, 2019, U.S. Bank filed its Complaint against Chicago Title [ECF No. 1];

2. Thereafter, on January 3, 2020, the Court granted the Parties’ Stipulation to Stay the instant action pending the appeal in *Wells Fargo Bank, N.A. v. Fidelity National Title Ins. Co.*, Ninth Cir. Case No. 19-17332 (District Court Case No. 3:19-cv-00241-MMD-WGZ) (“*Wells Fargo II*”) [ECF No. 6];

1 3. Whereas, prior to the stay of litigation, Chicago Title has not yet responded to the
2 Complaint;

3 4. On November 5, 2021, the Ninth Circuit issued its Memorandum Disposition in *Wells*
4 *Fargo II*, vacating the district court's decision granting dismissal of Wells Fargo's claims and
5 remanding for further proceedings. The mandate issued on November 29, 2021.

6 5. Additionally, U.S. Bank intends on amending its Complaint.

7 6. Chicago Title does not have an objection to the amended pleading;

8 7. The Parties hereby agree that U.S. Bank shall have thirty (30) days from the entry of
9 the order on this Stipulation to file its amended pleading.

10 8. Defendants shall have thirty (30) days from the filing of U.S. Bank's amended
11 pleading to file their response.

12 **IT IS SO STIPULATED.**

13 DATED this 11th day of April, 2022.

 DATED this 11th day of April, 2022.

14 WRIGHT, FINLAY & ZAK, LLP

 SINCLAIR BRAUN LLP

15 _____
16 /s/ Lindsay D. Dragon, Esq.

 /s/ Kevin Sinclair, Esq.

17 Lindsay D. Dragon, Esq.
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 Encino, California 91436
 Attorneys for Defendants

20 **IT IS SO ORDERED.**

21 DATED: 4-12-2022
22 _____



23 Cam Ferenbach
24 United States Magistrate Judge
25
26
27
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